

From: Mark.Clook@hse.gsi.gov.uk
To: Russell.Wasem/DC/USEPA/US@EPA
Cc: Laura.Parsons/DC/USEPA/US@EPA; Neil.Anderson/DC/USEPA/US@EPA
Subject: RE: Rodenticide Questions Related to Outdoor Use of Brodifacoum, Flocoumafen, and Difethialone
Date: 02/16/2012 12:25 PM

Russell
Cc Laura and Neil

Thanks for the email - you raise some interesting points. Outlined below is a very brief reply - I am off for a week as of today hence the rather rushed reply. Please feel free to come back for further clarification or alternatively I am more than happy to discuss over the phone. Hopefully, I have address your points below:

Currently, three active substances are restricted to indoor use only - brodifacoum, flocoumafen and difethialone.
Indoor use is defined as:

Indoors is defined in this context by the registration authorities as:-

i) situations where the bait is placed within a building or other enclosed structure and where the target is living or feeding predominantly within that building or structure; and
ii) behind closed doors. If rodents living outside a building can move freely to where the bait is laid within the building, then products containing brodifacoum/flocoumafen should NOT be used. Open barns or buildings and tamper-resistant bait stations placed in open areas are not classified as indoors. However, sewers or closed drains are considered to be 'indoors situations'.

An indoor use restriction has been in place since the mid 1980s and was first used for products containing brodifacoum.

The above phrase was developed following concern as to exactly what indoors meant in the mid 1990s.

There have been incidents involving brodifacoum and flocoumafen reported to WIIS and these may be due to the following reasons: (i) misuse, i.e. users placing bait outdoors and hence not in line with the restriction or (ii) abuse where someone has deliberately used a bait to kill a non-target organisms or (iii) rats treated with either of these compounds leaving the building and dying or being consumed by a predator outdoors.

In addition to the Wildlife Incident Investigation Scheme data there are additional data in the predatory bird monitoring scheme or PBMS for short. Details of PBMS can be found at <http://pbms.ceh.ac.uk/>.

An analysis of the incident data and usage of the these compounds was carried out in the late 1990 and may be of interest - Luttik R, Clook MA, Taylor MR & Hart ADM (1999) The regulatory aspects of the ecotoxicological risk assessment of rodenticides. In Advances in Vertebrate Pest Management Pest Management, p 369-385, ed Cowan P.D. and Feare C.J. Filander Verlag, Further Germany.

I appreciate that the above probably doesn't answer all your questions - I am happy to discuss further.

I apologise for the rushed response

All the best

Mark

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-----Original Message-----

From: Russell Wasem [mailto:Wasem.Russell@epamail.epa.gov]
Sent: Wednesday, February 15, 2012 8:30 PM
To: Mark Clook
Cc: Laura Parsons; Neil Anderson
Subject: Fw: Rodenticide Questions Related to Outdoor Use of Brodifacoum, Flocoumafen, and Difethialone

Greetings Mark,

I work for the pesticide regulatory authority in the US and I have few questions about rodenticide usage and regulation in the UK and how successful these restrictions (specifically the indoor only restriction) have been at reducing wildlife exposure to these compounds.

Based on your Directorate's recent wildlife poisoning information it appears rodenticides (specifically 2nd generation compounds) are still implicated in a high number of wildlife incidents. Which leads us to wonder about the extent of the indoor only use of the 2nd generation compounds and/or widespread misuse.

We would greatly appreciate discussing with you the UK's use instructions/restrictions for rodenticides, how long have these restrictions been in place, and any other information/experience you could share about your Directorate's efforts to reduce wildlife exposure to rodenticides? Is this something you can discuss with us further? If you are not the appropriate contact for this I would greatly appreciate if you could put me in touch with a colleague that is more familiar with rodenticides.

Kind Regards,

Rusty_____

Rusty Wasem / Chemical Review Manager
Risk Management & Implementation Branch 1* Pesticide Re-evaluation
Division* / Office of Pesticide Programs US Environmental Protection
Agency
+001 703 / 305 6979
----- Forwarded by Russell Wasem/DC/USEPA/US on 02/15/2012 03:03 PM

From: <BIOCIDES@hse.gsi.gov.uk>
To: Russell Wasem/DC/USEPA/US@EPA
Date: 02/15/2012 12:21 PM
Subject: FW: Rodenticide Questions Related to Outdoor Use of
Brodifacoum, Flocoumafen, and Difethialone
Sent by: <Claire.Holstein@hse.gsi.gov.uk>

Dear Rusty

Thank you for your email.

In the UK there is a Wildlife Incident Investigation Scheme (WIIS) which produces annual reports on suspected incidents of pesticide poisoning of animals (including wildlife). For more information see <http://www.pesticides.gov.uk/guidance/industries/pesticides/topics/reducing-environmental-impact/wildlife>. Further reports are available at <http://www.sasa.gov.uk/animal-poisoning-reports>. There is also a long term review of WIIS information available at <http://www.fera.defra.gov.uk/wildlife/wiu.cfm>.

If you require a bit more background on WIIS and how we use it the information you can contact Mark A Clook, who is head of CRD Ecotoxicology Branch, his contact details are

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Email mark.clook@hse.gsi.gov.uk

I hope this information helps

Kind Regards

Claire Holstein
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-----Original Message-----

From: Russell Wasem [<mailto:Wasem.Russell@epamail.epa.gov>]
Posted At: Tuesday, February 07, 2012 7:58 PM
Posted To:
Conversation: Rodenticide Questions Related to Outdoor Use of
Brodifacoum, Flocoumafen, and Difethialone
Subject: Rodenticide Questions Related to Outdoor Use of Brodifacoum,
Flocoumafen, and Difethialone

Greetings,

I work for the pesticide regulatory authority in the US and I have few questions about rodenticide usage in the UK and more specifically how